

# **Exhibit D**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

KATHEENA SONEEYA,

Plaintiff,

Civil Action  
No. 07-12325-DPW

V.

April 8, 2019

THOMAS A. TURCO III, in his official  
capacity as Commissioner of the  
Massachusetts Department of Correction, 10:23 a.m.

Defendant.

TRANSCRIPT OF BENCH TRIAL DAY 1

BEFORE THE HONORABLE DOUGLAS P. WOODLOCK

UNITED STATES DISTRICT COURT

JOHN J. MOAKLEY U.S. COURTHOUSE

1 COURTHOUSE WAY

BOSTON, MA 02210

DEBRA M. JOYCE, RMR, CRR, FCRR

KELLY MORTELLITE, RMR, CRR

Official Court Reporters

John J. Moakley U.S. Courthouse

1 Courthouse Way, Room 5204

Boston, MA 02210

joycedebra@gmail.com

1 witness, ask me.

2 MS. HANCOCK: Okay. Apologies, your Honor.

3 BY MS. HANCOCK:

4 Q. So two versions were released since 1999, correct?

5 A. Correct.

6 Q. And one in 2001, as you just testified, right?

7 A. Right.

8 Q. And another one in 2011; is that right?

9 A. Yes.

10 Q. And as you understand it, there's going to be an eighth  
11 version coming out soon, correct?

12 A. Yes.

13 Q. And you're not involved in drafting that version, correct?

14 A. I am not.

15 Q. And you requested to participate in drafting that version,  
16 correct?

17 A. I'm not sure that's correct.

18 Q. You did not ask to be involved in drafting that version?

19 A. I think -- I think I actually might have, now that you  
20 bring it up, but I was told I had to be a member of WPATH.

21 Q. Now, you've worked as a consultant for the DOC since  
22 around 2007 or 2008. Does that sound right?

23 A. That sounds right.

24 Q. And you're not technically engaged by the DOC, though,  
25 right?